

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)**

<b>Louis M. Lupo</b>	:	
Plaintiff	:	
<b>v.</b>	:	<b>Case No.: 8:14-cv-00475-DKC</b>
<b>JPMorgan Chase Bank, N.A., et al.</b>	:	
Defendants	:	

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**ANSWER**

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One of the Defendants, Specialized Loan Servicing, LLC (“SLS”), by and through its attorneys, Aaron D. Neal, and McNamee, Hosea, Jernigan, Kim, Greenan & Lynch, P.A., submits this Answer to Plaintiff’s Verified Amended Complaint [ECF No. 18], and says:

**SPECIFIC ADMISSIONS AND DENIALS**

1. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.<sup>1</sup>
2. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.

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<sup>1</sup> The numbered paragraphs of this section of the Answer will correspond to the similarly numbered paragraphs of ECF No. 18.

3. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
4. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
5. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
6. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
7. Denied.
8. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
9. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
10. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.

11. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
12. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
13. Admitted that SLS is a mortgage servicer with its principal place of business in Colorado and that it services mortgage loans that are secured by real property in Maryland.
14. Denied.
15. This paragraph does not contain any factual averments and thus no response is required.
16. Denied.
17. Denied.
18. Denied.
19. Denied.
20. Denied.
21. Denied
22. Denied.
23. This paragraph contains conclusions of law and not averments of fact, thus no response is required. To the extent that any portion of this paragraph is deemed by the Court to constitute a factual averment, said averment is denied.
24. Denied.
25. Denied.

26. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
27. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
28. Admitted.
29. Admitted.
30. Denied.
31. Admitted that Plaintiff signed a promissory note and was required to make monthly payments to the holder thereof. As the “Note” is not attached to the Verified Amended Complaint SLS does not have sufficient information to form a belief as to the truth of the remaining averments of this paragraph and to the extent a response is required, SLS denies the remaining averments of this paragraph.
32. As the “Note” is not attached to the Verified Amended Complaint SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
33. Admitted that Plaintiff signed a deed of trust. There is no “DOT” attached to the Verified Amended Complaint, thus SLS is unable to respond to the remainder of the averments in this paragraph.
34. As the “DOT” is not attached to the Verified Amended Complaint SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.

35. As the “DOT” is not attached to the Verified Amended Complaint SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
36. As the “DOT” is not attached to the Verified Amended Complaint SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
37. Denied.
38. Denied.
39. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
40. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
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128. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
129. Admitted that the referenced document was mailed to Plaintiff. The document speaks for itself and any averments that do not accurately reflect the content of the document are denied.
130. Denied.
131. Denied.
132. Admitted.
133. Admitted.
134. Denied as to the legibility of the type. SLS does not have sufficient information to form a belief as to the truth of the remaining averments of this paragraph and to the extent a response is required, SLS denies the remaining averments of this paragraph.
135. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
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158. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
159. Denied.

160. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.
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181. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.

182. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.

183. SLS lacks sufficient information to form a belief as to the truth of the averments of this paragraph and to the extent a response is required, SLS denies the averments in this paragraph.

**COUNT 1**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- c. Denied.
- d. Denied.

**COUNTS 2-4**

The Court's Order at ECF No. 43 dismissed all but one count of Counts 1-4, accordingly no response is required as to Counts 2-4.

**COUNTS 4-8**

The Court's Order at ECF No. 43 dismissed Counts 4-8, accordingly no response is required as to Counts 4-8.

### **COUNTS 5-12**

The Court's Order at ECF No. 43 dismissed Counts 5-12 accordingly no response is required as to Counts 5-12.

### **COUNT 13**

The Court's Order at ECF No. 43 dismissed Count 13, accordingly no response is required as to Count 13.

### **COUNT 14**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. Denied.
- c. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- d. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- e. Denied.
- f. Denied.
- g. Denied.
- h. Denied.

### **COUNT 15**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. Denied.

- c. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- d. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- e. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- f. Denied.
- g. Denied.

**COUNT 16**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. Denied.
- c. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- d. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- e. Denied.
- f. Denied.
- g. Denied.
- h. Denied.
- i. Denied.
- j. Denied.
- k. Denied.

- l. Denied.

**COUNT 17**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. Denied.
- c. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- d. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- e. Denied.
- f. Denied.

**COUNT 18**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. Denied.
- c. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- d. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- e. Denied.
- f. Denied.

**COUNT 19**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. Denied.
- c. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- d. Denied.
- e. Denied.

**COUNT 20**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. Denied.
- c. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- d. Denied.
- e. Denied.

**COUNT 21**

The Court's Order at ECF No. 43 dismissed Count 21, accordingly no response is required as to Count 21.

**COUNT 22**

The Court's Order at ECF No. 43 dismissed Count 22, accordingly no response is required as to Count 22.

**COUNT 23**

The Court's Order at ECF No. 43 dismissed Count 23, accordingly no response is required as to Count 23.

**COUNT 24**

The Court's Order at ECF No. 43 dismissed Count 24, accordingly no response is required as to Count 24.

**COUNT 25**

The Court's Order at ECF No. 43 dismissed Count 25, accordingly no response is required as to Count 25.

**COUNT 26**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. Denied.
- c. Denied.
- d. Denied.
- e. Denied.
- f. Denied.
- g. Denied.
- h. Denied.
- i. Denied.
- j. Denied.

**COUNT 27**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- c. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- d. Denied.
- e. Denied.
- f. Denied.
- g. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
  - i. Denied.
  - ii. Denied.
  - iii. Denied.
  - iv. Denied.
  - v. Denied.
  - vi. Denied.
  - vii. Denied.
  - viii. Denied.
  - ix. Denied.
  - x. Denied.

- h. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- i. Denied.
- j. Denied.
- k. Denied.
- l. Denied.

**COUNT 26**

- a. To the extent that this paragraph incorporates by reference the averments made in any prior paragraphs, SLS's prior responses thereto are incorporated herein by reference.
- b. Denied.
- c. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- d. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- e. Denied.
- f. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- g. Denied.
- h. This paragraph contains legal conclusions and not averments of fact, thus no response is required.
- i. Denied.
- j. Denied.
- k. Denied.



- l. Denied.
- m. Denied.
- n. Denied.

### **DEFENSES**

1. Failure to state a claim upon which relief may be granted.
2. Laches.
3. Limitations.
4. Waiver.
5. Res judicata.
6. Estoppel.
7. Immunity.
8. Plaintiff's correspondence, to the extent any were sent, are not subject to RESPA.

Respectfully submitted,

McNamee, Hosea, Jernigan, Kim,  
Greenan & Lynch, P.A.

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*Attorneys for SLS*

**Certificate of Service**

I hereby certify that on this 12<sup>th</sup> day of October, 2015 copies of the foregoing paper were  
filed via CM/ECF and served via first class mail on:

Louis M. Lupo  
545 Elmcroft Boulevard, Apt. 10213  
Rockville, Maryland 20850

/s/ Aaron D. Neal  
Aaron D. Neal